

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

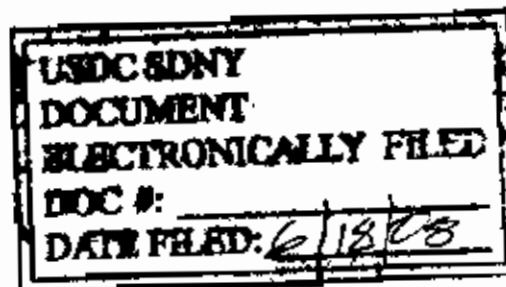
CHANEL, INC.,

Plaintiffs,

v.

TENG DA TRADING INC, TENG DA TRADING  
USA INC, XIANG YUAN FAN a/k/a SHAWN  
FAN and JOHN DOES 1-10,

Defendants.



Civ. No. 07cv11113 (NRB)(GWG)

**STIPULATION RE 60-DAY DISCOVERY EXTENSION / CASE SCHEDULE**

This Stipulation is entered into by and between Plaintiff Chanel, Inc. ("Plaintiff") and Defendants Teng Da Trading Inc., Teng Da Trading USA Inc. and Xiang Yuan Fan a/k/a Shawn Fan ("Defendants") (collectively, the "Parties"). At the initial Court conference held on February 13, 2008, Your Honor set a discovery close date of July 13, 2008. For the reasons set forth below, the Parties hereby stipulate to and respectfully request a 60-day extension of the discovery period and all other dates in the case as set forth in the schedule proposed below.

The Parties have been conducting discovery actively in the case. Both parties have produced documents; both parties have served written discovery requests (Defendants have served responses and Plaintiff's responses are due June 17, 2008) and; Plaintiff has taken the deposition of defendant Xiang Yuan Fan and on June 5, 2008, commenced the deposition of defendant Teng Da Trading USA Inc. ("Teng Da") pursuant to Rule 30(b)(6). The parties are presently trying to resolve a dispute concerning the adequacy of the witnesses designated by Teng Da pursuant to Rule 30(b)(6), and Plaintiff seeks to resume the deposition of Teng Da upon resolution of that dispute. Further, Plaintiff contemplates taking third party discovery (including

from Defendants' customers) in support of Plaintiff's allegations that Defendants knowingly contributed to the infringing conduct of their customers. Plaintiff is still in the process of identifying appropriate third parties for such depositions.<sup>1</sup> Defendants have also subpoenaed the testimony of one customer, whose declaration has been procured by Plaintiff so that Defendants have an opportunity to examine such declarant, and Defendants have subpoenaed such person for a deposition on June 26, 2008 in Los Angeles, California.

Given the unresolved discovery issues, the number of depositions that must be taken, the location of the witnesses and that some of the witnesses to be deposed still need to be identified, the Parties do not believe that the depositions can be completed by the current July 13, 2008 discovery deadline. The Parties agree that a 60-day extension of the discovery period would be necessary and adequate for them to complete the depositions and any outstanding discovery in the case, and respectfully request the same.

If Your Honor is inclined to grant the Parties' request for a 60-day extension of the discovery period, the Parties further stipulate to and respectfully request that Your Honor extend all other dates by 60 days as set forth in the following schedule (it is noted that this also avoids the issue of the Pretrial Order being due Christmas Day):

Fact Discovery Deadline	September 11, 2008
Expert Reports Due	October 10, 2008 <i>marks</i>
Rebuttal Reports Due / Expert Discovery Deadline	<del>December 10, 2008</del> November 19 <i>marks</i>

<sup>1</sup> Plaintiff requested that Defendants produce documents sufficient to identify Defendants' customers, but Defendants' documents only identified a small number of customers by name. Defendants have agreed to make available for inspection additional documents that would better identify customers. It is believed that most of the witnesses are outside New York.

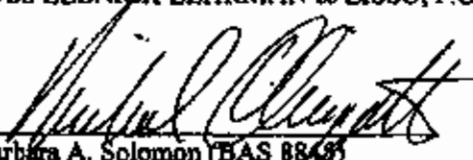
Summary Judgment Motion Deadline	January 24, 2008
Pretrial Order Due	February 23, 2008 (or, if a summary judgment motion is filed, 45 days after summary judgment decision)

IT IS SO STIPULATED.

Dated: New York, New York  
June 13, 2008

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By:

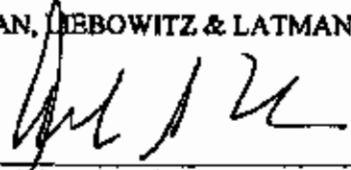
  
Barbara A. Solomon (BAS 8849)  
Michael Chiappetta (MC 7644)  
866 United Nations Plaza  
New York, New York 10017  
Tel: (212) 813-5900

Attorneys for Plaintiff Chanel, Inc.

Dated: New York, New York  
June 13, 2008

COWAN, LEBOWITZ & LATMAN, P.C.

By:

  
Ariana S. Cohen (AC 9034)  
Eric J. Shiranoff (ES 4558)  
1133 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 790-9200

Attorneys for Defendants Teng Da Trading USA  
Inc. and Xiang Yuan Fan a/k/a Shawn Fan

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June 17, 2008